

## **REMARKS**

In response to the above-identified Office Action, Applicants amend the Application and seek reconsideration thereof. In this response, Applicants amend claims 20 and 27. Applicants do not cancel or add any new claims. Accordingly, claims 20-23 and 26-29 are pending.

### **I. Claims Rejected Under 35 U.S.C. §102(e)**

The Patent Office rejects claims 20-23 and 26-29 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,714,784 issued to Ker et al. ("Ker"). Applicants amend claims 20 and 27.

To anticipate a claim, the relied upon reference must disclose every limitation of the claim. Among other elements, amended claim 20 defines a method of forming an integrated circuit comprising forming a protection circuit occupying a second well of the integrated circuit substrate separate from a first well, wherein forming the protection circuit includes forming a plurality of unit cells, the plurality of unit cells each comprised of a block of a doped region, a junction region and a contact to the doped region wherein each of the plurality of unit cells being separated from each other to form a plurality of islands in the second well surrounded by the doped region.

In making the rejection, the Patent Office characterizes Ker as showing a method of forming an integrated circuit including each of the elements recited in claim 20. Applicants respectfully submit Ker fails to teach at least a plurality of unit cells being separated from each other to form a plurality of islands in the second well surrounded by the doped region.

Referring to Fig. 4 of Ker, Ker teaches "four small-dimensioned square cells to form a large-dimension NMOS device." Ker, col. 4, lines 17-19. Each of the four small-dimension square cells is oriented adjacent to one another to form the single large-dimension NMOS device. See Ker, Fig. 4.

In contrast, claim 20 defines a plurality of unit cells being separated from each other to form a plurality of islands in the second well surrounded by a doped region. Therefore, since Ker only teaches that the four small-dimension square cells are adjacent to each other to form the large-dimension NMOS device, Ker cannot teach that the four small-dimension square cells are separated from each other to form a plurality of islands since unit cells forming an island cannot have other unit cells adjacent to them. Thus, Ker fails to teach each of the elements of claim 20.

The failure of Ker to teach each of the elements of claim 20 is fatal to the anticipation rejection. Therefore, claim 20 is not anticipated by Ker. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 20.

Claims 21-23 and 26 each depend from claim 20 and include all of the elements thereof. Therefore, claims 21-23 and 26 are not anticipated by Ker at least for the same reasons as independent claim 20. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 21-23 and 26.

Regarding the rejection to claim 27, among other elements, claim 27 defines a method of forming an integrated comprising forming a protection circuit occupying a second well of the integrated circuit substrate separate from the first well, the protection circuit including a plurality of unit cells forming a plurality of islands in the second well surrounded by a doped region similar to claim 20 discussed above. Therefore, Applicants respectfully submit the discussion above regarding Ker failing to teach a plurality of unit cells forming a plurality of islands in the second well surrounded by a doped region is equally applicable to similar elements defined in claim 27. Therefore, Ker fails to teach each of the elements of claim 27.

The failure of Ker to teach each of the elements of claim 27 is fatal to the anticipation rejection. Therefore, claim 27 is not anticipated by Ker. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 27.

Claims 28 and 29 each depend from claim 27 and contain all of the elements thereof. Therefore, Applicants respectfully submit claims 28 and 29 are not anticipated by Ker at least for the same reasons as claim 27. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 28 and 29.

### CONCLUSION

In view of the foregoing, it is believed that all claims now pending (1) are in proper form, (2) are neither obvious nor anticipated by the relied upon art of record, and (3) are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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Dated: 3/30/04

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3/30/04  
Nadya Gordon 3/30/04  
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